## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA : 1:20CR362

:

v.

ALYSON BROOKE SAUNDERS : FACTUAL BASIS FOR PLEA REDACTED

IN ACCORDANCE WITH §3509

NOW COMES the United States of America, by and through Steven R. Grocki, Chief, Child Exploitation and Obscenity Section, and Nadia Prinz, Trial Attorney, and as a factual basis under Rule 11, Fed. R. Crim. P., filed under seal pursuant to 18 U.S.C. § 3509, states the following facts which the Government would have proven at trial:

1. In February of 2019, Investigators with Homeland Security
Investigations in Winston Salem and the North Carolina State Bureau of
Investigation received information that the defendant, ALYSON BROOKE
SAUNDERS, (SAUNDERS) was in an online relationship with one Gavin
Collins, a convicted sex offender and UK citizen residing in London. During a
sex offender home visit at Collin's residence, London Metropolitan Police
learned that Collins was in possession of child pornography and that he was
corresponding with SAUNDERS, a day care teacher in North Carolina. Upon
receiving this information, HSI agents contacted SAUNDERS and learned

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she was employed at a day care facility in Greensboro, North Carolina, within the Middle District of North Carolina.

2. Between on or about February 28 and April 4, 2019, agents conducted
multiple interviews of SAUNDERS. According to SAUNDERS admissions,
Collins had asked her to produce and send him images
SAUNDERS indicated she was
aware of Collins' sexual interest in children. SAUNDERS further indicated
that on multiple occasions in or about February through March of 2019, she
took advantage of opportunities to be alone with various minors, such as
when changing their diapers or assisting them in the bathroom.

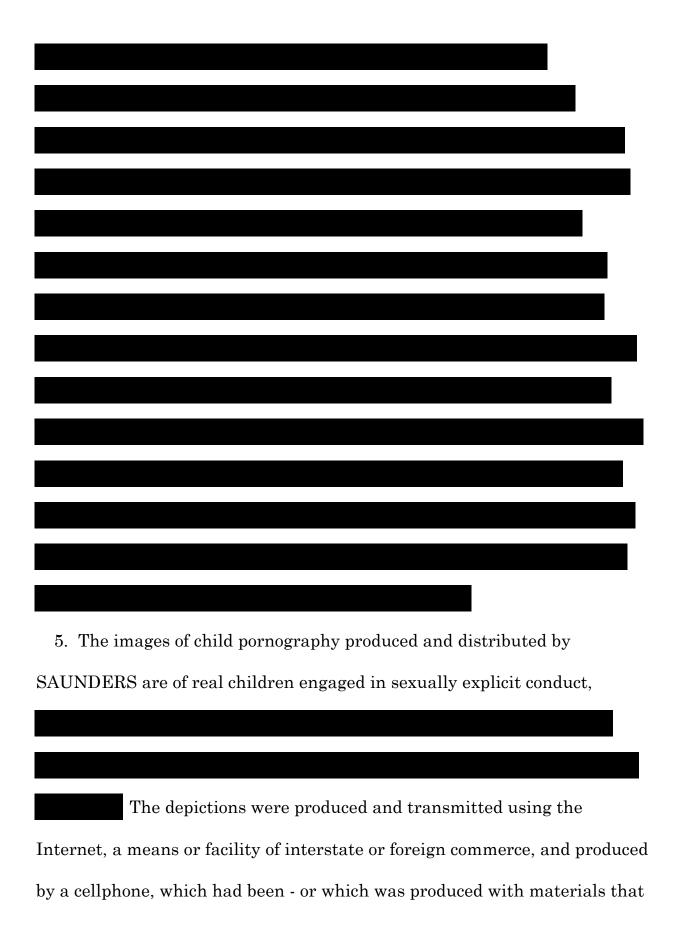
Saunders further stated she would record photos or videos of this conduct at the daycare using her iPhone. Thereupon she would electronically forward these videos and images to COLLINS via Wickr, an encrypted internet-based chat application. SAUNDERS claimed she would then immediately delete the captured images to avoid future detection from law enforcement. While

capturing these images and recordings on her iPhone, she sometimes displayed hand-written notes that contained messages to third-party subjects with whom Collins communicated on the internet. SAUNDERS was told by Collins to destroy the notes afterwards, which she did. SAUNDERS also disclosed that she and Collins had been on a hidden service on the Tor network called the Annex, which website was for users interested in viewing and sharing child pornography.

3. SAUNDERS identified each respective minor victim by name and
image and made related specific admissions as follows.
. SAUNDERS indicated she sent all these
images to Collins. SAUNDERS indicated she created and sent Collins these

images because she was worried he would not speak to her if she did not send them.

4. A forensic examination Collin's hard drives, initially seized by the
London Metropolitan Police in the course of their own investigation, revealed
that he had received and saved images which SAUNDERS had sent him.
SAUNDERS was shown images and video clips possessed by Collins on his
hard drives and she admitted to having created and sent about 39 of these
images, including images of minors depicted in sexually explicit conduct as
well as images of herself engaged in other sexual acts. For instance,



had been - mailed, shipped, or transported across state lines or in foreign commerce by any means.